



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via Electronic and U.S. Postal Service

April 20, 2012

Mr. Brian Kelly
Assistant Secretary, Birch / Kraemer, LLC
Chevron Business and Real Estate Services
145 South State College Boulevard
Suite 400
Brea, California 92821

Re: Birch Hills Golf Course, Brea California – Planning Area 12A

Dear Mr. Kelly:

The U.S. Environmental Protection Agency Region 9 (USEPA) appreciates URS Corporation's (URS's) submission of the March 26, 2012 "Surface Soil Sample Report – Planning Area 12A Birch Hills Golf Course 2250 East Birch Street, Brea, California" on behalf of Chevron Land and Development Company (Chevron). Based on our review of the subject report, we are responding to Chevron's request for USEPA's determination that no additional soil characterization for polychlorinated biphenyls (PCBs) is necessary at Planning Area 12A (or Area 12A) under the Toxic Substances Control Act (TSCA) regulations for PCBs. The approximate 5.8-acre Area 12A is part of the Birch Hills Golf Course Site and will be redeveloped as low income housing.

The subject report summarizes the sampling activities and laboratory analysis results for PCBs in soil samples collected within Area 12A following URS's January 23, 2012 "Surface Soil Sample and Analysis Plan – Planning Area 12A" (SAP). USEPA approved this SAP with conditions on February 2, 2012 under 40 CFR 761.61(c). The soil analysis results presented in the subject report indicate that PCBs were not detected in Area 12A at a depth of three (3) inches below ground surface (bgs). In addition, multi-depth soil borings (0.5 feet bgs to depths up to 25 feet bgs) collected by URS before USEPA's involvement with the Site also show that PCBs were not detected in these borings.

Based on the information presented in the subject report, USEPA believes that additional soil characterization for PCBs in this area is not necessary. However, USEPA retains its authority under TSCA to require further soil characterization and cleanup of PCBs in Area 12A if at any time during grading, construction, and/or post-redevelopment PCBs are found. If PCBs are found, the owner of the property must notify USEPA of such finding. USEPA will provide assistance on how to manage any soils that may be contaminated with total PCBs above USEPA's Regional Screening Level (RSL) of 0.22 mg/kg for PCBs or a revised RSL that may be available at the time of such finding.

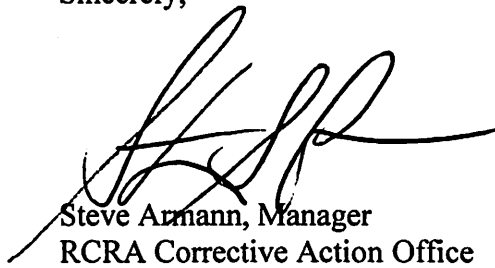
In addition to PCBs, soils from Area 12A were analyzed for other contaminants including dioxins and furans and arsenic. The Orange County Health Care Agency (OCHCA) is involved with all the non-PCB contaminants at the Site (including Area 12A). USEPA is only addressing PCBs at the Site under TSCA.

Mr. Brian Kelly
Re: Birch Hills Golf Course – Planning Area 12A
Date: April 20, 2012

We appreciate Chevron's and URS' additional soil characterization work for PCBs conducted in Area 12A and submission of the subject report.

Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this letter. Thank you.

Sincerely,



Steve Armann, Manager
RCRA Corrective Action Office
Waste Management Division

Cc: Jim Martinez, Birch/Kramer, LLC
(JAMartin@Chevron.com)

Jerome Zimmerle, URS Corporation
(Jerome.zimmerle@urs.com)

Steve T. Speer, OCHCA
(STSpeer@OCHCA.com)

Kamron Saremi, SARWQCB
(KSaremi@waterboards.ca.gov)

Carmen D. Santos, USEPA R9
Nathan Dadap, USEPA R9